

# EPA REGISTRATION FILE

## 69361-30 (Part 2)

Documents added after September 20, 2011

# Material to be added to an e-Jacket/Jacket

Reg. No. 69361-30

Description: Nst.

1. ☒ Placement within the e-Jacket/jacket:
- ☒ Default: (chronological, top = newest)
  - ☐ File Location: (PDF page number, i.e., "before page 45")

2. ☒ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☒ Notification
- ☒ New CSF
- ☐ Other: \_\_\_\_\_

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, **NOT STAPLED**. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: End krafft

Phone: 308.5358 Division: 10

Date: 9-20-11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Bhushan Mandava  
1050 Connecticut Ave. NW  
Suite 1000  
Washington, DC 20036

9-20-11

Subject: EPA Reg. 69361-30 / Pendimethalin Technical Notification

Dear Mr. Mandava:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 8-22-11 for the product EPA Reg. 69361-30 / Pendimethalin Technical. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action falls within the scope of PRN 98-10. Alternate CSF #1 is acceptable.

If you have any questions please call Erik Kraft at 703-308-9358 or email at [Kraft.Erik@epa.gov](mailto:Kraft.Erik@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis  
Product Manager 25  
Herbicide Branch  
Registration Division (7505P)

# **MANDAVA ASSOCIATES, LLC**

*CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS*

*1050 CONNECTICUT AVENUE, N.W., SUITE 1000, WASHINGTON, DC 20036*

*TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-Mail: mandava@compuserve.com*

## **Hand Delivered**

August 22, 2011

Mr. Erik Kraft  
Herbicide Division  
Pesticide Registration Division (7505P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Washington, D.C. 20460

SUBJECT: EPA Reg. 69361-30 / Pendimethalin Technical Notification

Dear Mr. Kraft:

This is a follow up to our August 18, 2011 telephone conversation and email correspondence with you regarding the alternate source for pendimethalin. As you suggested, we have prepared the CSF for alternate source -- from [REDACTED] as 100% repack.

In the CSF, we have listed:

- 1) Pendimethalin technical with the percentage as shown on the label.
- 2) Under columns 13, we have listed it as 100% repack

We have prepared the CSF for Pendimethalin Technical as recommended by you.

Please review the attached CSFs and approve [REDACTED] as alternate source for Pendimethalin Technical for use by Repar Corporation.

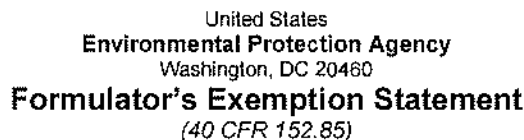
If there are further questions, please contact us at 202-223-1424.

Sincerely,



N. Bhushan Mandava, Ph.D., RAC  
Agent for Repar Corporation

Attachment

EPA Form 8570-27 (Rev. 06-2004)

**5**

# Material to be added to an e-Jacket/Jacket

Reg. No. 6936-1-30

Description: Notif.

1. ☒ Placement within the e-Jacket/jacket:
- ☒ Default: (chronological, top = newest)
  - ☐ File Location: (PDF page number, i.e., "before page 45")

2. ☐ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☐ Notification
- ☐ New CSF
- ☐ Other: \_\_\_\_\_

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Erik Kraft

Phone: 308-5357 Division: RD

Date: 8-2-11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Bhushan Mandava  
Mandava Associates, LLC  
1050 Connecticut Ave.  
Suite 1000  
Washington, DC 20036-4510

8.7.11

Subject: EPA Reg. 69361-30 / Pendimethalin Technical Notification

Dear Mr. Mandava:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 2-9-11 for the product EPA Reg. 69361-30 / Pendimethalin Technical. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action doesn't fall within the scope of PRN 98-10. The revised basic csf is unacceptable. A basic csf may only have one source of an active ingredient. If you wish to have alternate sources for an active ingredient this must be listed on an alternate csf. Also the EPA Reg. #s you listed on page 3 don't have the same percentage of AI as the technical pendimethalin source listed on page 1.

If you have any questions please call Erik Kraft at 703-308-9358 or email at [Kraft.Erik@epa.gov](mailto:Kraft.Erik@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis".

Kable Bo Davis  
Product Manager 25  
Herbicide Branch  
Registration Division (7505P)

# **MANDAVA ASSOCIATES, LLC**

**CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS**

**1050 Connecticut Ave, Suite 1000, WASHINGTON, DC 20036-4510**

**Telephone: (202)-223-1424/1747 · Fax: (202)-223-0141 · E-MAIL: [Mandava@compuserve.com](mailto:Mandava@compuserve.com)**

February 9, 2011

Document Processing Desk (AMEND)  
Registration Division (7504P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
2700 South Crystal Drive  
Arlington, VA 22202

Attention: Linda Arrington  
Minor Formulation Review and Notifications Coordinator  
Registration Support Branch

SUBJECT: Repair Corporation  
Pendimethalin Technical, EPA Registration Number: 69361- 30  
Notification for Alternate Source for Active Ingredient per  
PR Notice 98-10

Dear Ms Arrington:

On behalf of Repair Corporation, enclosed please find an application for Notification for addition of alternate source.

In support of the Notification, we are submitting the following materials:

1. Application for Registration (EPA Form 8570-1)
2. Two Copies of Confidential Statement of Formula (CSF) for alternate sources (EPA Form 8570-4)
3. Formulator's Exemption Statement (EPA Form 8570-27)
4. One Copy of Confidential Statement of Formula for existing approved formulation

The requested regulatory action falls under the criteria of Notification as per PR Notice 98-10.

If you should have any questions please contact us at (202) 223 - 1424 or via e-mail at [mandava@compuserve.com](mailto:mandava@compuserve.com).

Sincerely yours,

*N. Bhushan Mandava*

N. Bhushan Mandava, Ph.D.  
Agent for Repair Corporation

Enclosures





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 69361-30	2. EPA Product Manager James Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Pendimethalin Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Repar Corporation P.O. Box 4321 Silver Spring, MD 20914 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of alternate source per PR Notice 98-10.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name N. Bhushan Mandava		Title Agent for Repar Corporation	
		Telephone No. (Include Area Code) 202-223-1424	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature <i>N. Bhushan Mandava</i>		3. Title Agent for Repar Corporation	
4. Typed Name N. Bhushan Mandava		5. Date February 9, 2011	

Form approved. OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.



United States  
Environmental Protection Agency  
Washington, DC 20460  
**Formulator's Exemption Statement**  
(40 CFR 152.85)

Applicant's Name and Address  Repar Corporation P.O. Box 4321 Silver Spring, MD 20910	EPA File Symbol/Registration Number 69361-30
	Product Name PENDIMETHALIN TECHNICAL
	Date of Confidential Statement of Formula (EPA Form 8570-4) 02/09/2011

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Pendimethalin: (1-Ethylpropyl) -3,4-dimethyl-2,6-dinitrobenzenamine

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).


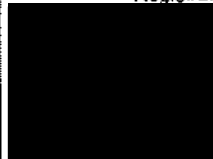
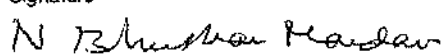
(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Pendimethalin: (1-Ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzenamine		
Signature 	Name and Title Agent for Repar Corporation	Date 02/09/2011

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA  
Copy 2 - Applicant copy

